UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
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August 18, 2008

Ref: 8EPR-N

Vidal Davila, Superintendant
26611 U.S. Highway 385
Hot Springs, SD 57747-9430

<div align="right">

RE: Wind Cave National Park, Elk Management
Plan Draft Environmental Impact Statement; CEQ
#20080237

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Dear Mr. Davila,

In accordance with EPA's responsibilities under the National Environmental Policy Act (NEPA) 42 U.S.C. Section 4332(2)(C), and our authorities under Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the Wind Cave National Park, Elk Management Plan Draft Environmental Impact Statement (DEIS).

The proposed action would identify elk management strategies for Wind Cave National Park in Custer County, South Dakota that will balance natural system functions with native wildlife and vegetation. These strategies are necessary because the elk population in the park is not controlled by natural ecosystem processes. Given the current condition of elk overpopulation in the park, if no action were taken, an increasing elk population would result in increased adverse impacts on park resources, including native vegetation, the habit and health of wildlife, and adjacent land uses.

The DEIS identifies the following alternatives for evaluation:

- Alternative A (No Action) would continue current management actions with no changes made to manage elk populations or their impacts to park resources.
- Alternative B (Hunting Outside the Park) would maximize the use of hunting outside the park on public and private lands to reduce and maintain the population of elk using the park. Alternative B is the park's preferred alternative and its environmentally preferable alternative.
- Alternative C (Roundup and Live Shipment or Euthanasia) would entail movement of elk into an existing corral facility within the park. Following that, elk would be shipped to a slaughterhouse and processing facility, and potentially made available for donation. Alternatively, if the preceding plan cannot be implemented, elk would be killed humanely at the corral site by shooting and/or

euthanasia.

- Alternative D (Sharpshooting) would maximize the use of sharpshooters within the park to reduce and maintain elk population.
- Alternative E (Contraception by Sterilization for Maintenance Only) would use permanent sterilization to maintain target elk population following reduction by other methods described in Alternatives B-D.
- Alternative F (Fertility Control Agent for Maintenance Only) would use chemical control fertility agents to maintain target elk population following reduction by other methods described in Alternatives B-D.

EPA concurs that Alternative B, Hunting Outside the Park, appears to be the environmentally preferable alternative. This alternative seeks to balance the objective of reducing and maintaining a more sustainable elk population while minimizing further potential environmental impacts to park resources. Additionally, EPA supports the development of a monitoring and adaptive management plan incorporated into the DEIS action alternatives. This plan allows the park flexibility to modify management actions, if so indicated by monitoring activities, in order to meet the project objectives.

Pursuant to EPA policy and guidance, EPA rates the environmental impact of an action and the adequacy of the NEPA analysis. EPA has rated Wind Cave National Park's preferred Alternative B as Lack of Objections ("LO") under our rating criteria, which is enclosed. The "LO" rating indicates that EPA's review has not identified any potential environmental impacts requiring substantive changes to the proposal.

Thank you for the opportunity to provide comments on the DEIS. If you have questions regarding EPA's comments, please contact me at (303) 312-6004 or Larry Kimmel, EIS project manager, at (303) 312-6659.

Sincerely,

/s/

Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection and Remediation

Enclosure